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June 27, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2016 ETC Annual Report of Columbus Communications Services (SAC 411756)**

Dear Ms. Dortch:

On behalf of **Columbus Communications Services Telephone Company LLC**, Kiesling Associates LLP files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> **Columbus Communications Services** seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, an attached letter requests confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions about this filing to the undersigned at 608-664-9110 or rabrams@kiesling.com.

Sincerely,

KIESLING ASSOCIATES LLP

A handwritten signature in black ink that reads 'Robert R. Abrams'.

Robert R. Abrams  
Senior Telecommunications Consultant

cc: **Kansas Corporation Commission**

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 28, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Docket 14-58  
2016 ETC Annual Report of Columbus Communications Services (SAC 411756)  
Request for Confidentiality**

Dear Ms. Dortch:

On behalf of **Columbus Communications Services LLC** (the “Company”), Kiesling associates LLP hereby requests withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup>. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is the attachment at Line 112 of the Company’s annual reporting information in FCC Form 481, pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2016 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan, as provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.
4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company’s network.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

In its *March 5, 2013 Order*, the FCC specified that for rate-of-return carriers, the five-year plans “should describe the carrier’s network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories.”<sup>5</sup> The Company is a rate-of-return carrier filing its five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company’s existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company’s existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company’s serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to existing and potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company’s customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

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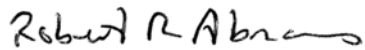
<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) (“*March 5, 2013 Order*”) at para. 9 citing Section 54.202(a) (1) (ii).

Based on the preceding, Kiesling respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned at 608-664-9110 or rabrams@kiesling.com with questions regarding this request.

Sincerely,

KIESLING ASSOCIATES LLP

A handwritten signature in black ink that reads "Robert R. Abrams". The signature is written in a cursive, flowing style.

Robert R. Abrams  
Senior Telecommunications Consultant

cc: **Kansas Corporation Commission**

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form****REDACTED – FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Patricia Carroll
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	tcarroll@columbus-telephone.com
	Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no )	<input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no )	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

411756ks112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes



<b>(300) Unfulfilled Service Request Data Collection Form</b>	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010> Study Area Code	411756
<015> Study Area Name	COLUMBUS TELEPHONE
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035> Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

<300> Unfulfilled service request (voice)	0
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<310> Detail on attempts (voice)	Name of Attached Document
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<320> Unfulfilled service request (broadband)	0
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<330> Detail on attempts (broadband)	Name of Attached Document
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(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
		411756ks510.pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

<b>(600) Functionality in Emergency Situations Data Collection Form</b>	<b>REDACTED – FOR PUBLIC INSPECTION</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	411756ks610.pdf



**REDACTED – FOR PUBLIC INSPECTION**

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com
<810>	Reporting Carrier	Columbus Communications Services, LLC
<811>	Holding Company	Columbus Telephone Company
<812>	Operating Company	Columbus Communications Services, LLC

[illegible]

<b>(900) Tribal Lands Reporting</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	411756
<015> Study Area Name	COLUMBUS TELEPHONE
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035> Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

<1000>      Voice services rate comparability certification      Yes

<1010>      Attach detailed description for voice services rate comparability compliance

\_\_\_\_\_  
Name of Attached Document

<1020>      Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030>      Attach detailed description for broadband comparability compliance

\_\_\_\_\_  
Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

“Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2000) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<2010>	2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support		
<2011>	3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support		
<2022>	Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.		
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.		
<2024A>	Round 2 Recipient of Incremental Support?		
<2024B>	Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	
<2025A>	Round 1 or Round 2 Recipient of Incremental Support?		
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-	Name of Attached Document Listing Required Information	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing  
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

**REDACTED – FOR PUBLIC INSPECTION**

**(3005) Rate Of Return Carrier Additional Documentation  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	411756ks3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		<input type="checkbox"/>
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input checked="" type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input checked="" type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	411756ks3026.pdf

**REDACTED – FOR PUBLIC INSPECTION**

**REDACTED – FOR PUBLIC INSPECTION**

**COLUMBUS COMMUNICATIONS SERVICES, LLC (SAC 411756)**

**ATTACHMENT - LINE 3026, and  
FINANCIAL DATA SUMMARY – LINES 3027-3034**

**REDACTED IN ENTIRETY**

<b>(4005) Rural Broadband Experiment Additional Documentation</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
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<010>	Study Area Code	411756
<015>	Study Area Name	COLUMBUS TELEPHONE
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035>	Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

<b>4003b.</b> Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

<b>4004a.</b> Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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<b>4004b.</b> Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	411756
<015> Study Area Name	COLUMBUS TELEPHONE
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Patricia Carroll
<035> Contact Telephone Number - Number of person identified in data line <030>	6204293132 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>Kiesling Associates LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Kiesling Associates LLP
Name of Reporting Carrier:	COLUMBUS TELEPHONE
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/24/2016
Printed name of Authorized Officer:	Patricia Carroll
Title or position of Authorized Officer:	Secretary
Telephone number of Authorized Officer:	6204293132 ext.
Study Area Code of Reporting Carrier:	411756 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	COLUMBUS TELEPHONE
Name of Authorized Agent Firm:	Kiesling Associates LLP
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/24/2016
Name of Authorized Agent Employee:	Kiesling Associates LLP
Title or position of Authorized Agent or Employee of Agent	Telecommunications Consultant
Telephone number of Authorized Agent or Employee of Agent:	6086649110 ext.243
Study Area Code of Reporting Carrier:	411756 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

**REDACTED – FOR PUBLIC INSPECTION**

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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[illegible]

**REDACTED – FOR PUBLIC INSPECTION**

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<030>	Contact Name - Person USAC should contact regarding this data	Patricia Carroll
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<039>	Contact Email Address - Email Address of person identified in data line <030>	tcarroll@columbus-telephone.com

<810>	Reporting Carrier	Columbus Communications Services, LLC
<811>	Holding Company	Columbus Telephone Company
<812>	Operating Company	Columbus Communications Services, LLC

[illegible]

**REDACTED – FOR PUBLIC INSPECTION**

**REDACTED – FOR PUBLIC INSPECTION**

**COLUMBUS COMMUNICATIONS SERVICES, LLC (SAC 411756)**

**ATTACHMENT - LINE 112**

**PROGRESS REPORT ON THE  
FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN**

**ATTACHMENT REDACTED IN ITS ENTIRETY**

**Columbus Telephone Company (SAC 411756)**

Statement Regarding Compliance with Service Quality Standards and Consumer Protection Rules  
47 CFR §54.313(a)(5)

Form 481, Line 510

Columbus Telephone Company (CTC) is an incumbent local exchange carrier operating in the state of Kansas, and is an eligible telecommunications carrier (ETC) designated by the Kansas Corporation Commission (KCC). As such, CTC is subject to the regulatory authority of the KCC and operates under the relevant rules and laws of the state of Kansas.

CTC is subject to the service quality standards and consumer protection standards adopted by the KCC and that are applicable to ILECs in the state of Kansas. These standards are contained in Orders adopted by the KCC in Docket No. 95-GIMT-047-GIT (specifically the KCC Order dated May 23, 2008) and Docket No. 06-GIMT-187-GIT. The consumer protection standards are also contained in CTC's local tariff that is on file with the KCC.

Apart from effective internal procedures and operations, CTC ensures compliance with all applicable service quality and consumer protection rules through KCC enforcement, which entails the operation of an effective customer complaint process. KCC is required to respond to customer complaints and other service quality-related inquiries from the KCC in a reasonable time frame. CTC consistently meets or exceeds all KCC-adopted standards, and reports to this effect via all required KCC processes.

Finally, CTC has established internal procedures to ensure compliance with the Federal Communications commission's customer Proprietary Network Information (CPNI) rules that include, but are not limited to, periodic employee training and maintenance of written company CPNI procedures. CTC certifies its compliance with the FCC's CPNI rules by making annual filings as required in 47 CFR §64.2009(e).

**Columbus Telephone Company (SAC 411756)**

Statement Regarding the Ability to Function in Emergency Situations

47 CFR S §54.313(a)(6)

Form 481, Line 610

47 CFR §54.313(a)(6) requires an ETC to certify that it is able to function in emergency situation as set forth in 47 CFR §54.202 (a)(2).

Columbus Telephone Company (CTC) is an incumbent local exchange carrier operating in the state of Kansas, and is an eligible telecommunications carrier (ETC) designated by the Kansas Corporation Commission (KCC). As such, CTC is subject to the regulatory authority of the KCC and operates under the relevant rules and laws of the state of Kansas.

CTC is subject to KCC rules regarding the ability to remain functional in emergency situations by:

- (1) Maintaining at least eight hours of backup power to ensure functionality without local alternating current (AC) commercial power,
- (2) Establishing the ability to reroute traffic around damaged facilities and to manage traffic spikes resulting from emergency situations, and
- (3) Establishing procedures for employees to follow in an emergency, to prevent or minimize interruption or impairment of telecommunications services.

CTC has one fixed generator capable of providing the required level of backup power. CTC's network is capable of rerouting traffic around damaged facilities, although this ability is not absolute and may be limited in certain circumstances. However, CTC follows all industry standard practices in ensuring its network remains functional during different types of emergency situations.

CTC certifies it has complied with, and will continue to comply with applicable requirements regarding its ability to remain functional in an emergency situation as set forth in 47 CFR §54.202 (a)(2).

**Columbus Telephone Company (SAC 411756)**  
Statement of Lifeline Service Terms and Conditions  
47 CFR §54.422(a)(2)

**Form 481, Line 1210**

Columbus Telephone Company offers Lifeline service to qualifying subscribers.

- Qualifying subscribers receive Lifeline credits of \$9.25 via the federal Low Income program on their telephone bill. The Lifeline benefit reduces the regular monthly rate for any single line residential local telephone service. This benefit is limited to one per qualifying household, and for service received from a single provider.
- Number of Local Minutes/Calls Provided: Unlimited local calling.
- Additional Charges for Toll Calls: Toll calls and services for Lifeline subscribers are available and are billed at carriers' standard rates.
- Federal program eligibility for Lifeline service must be confirmed before the credit is issued. All subscribers must be recertified at least once each year.

Lifeline eligibility methodology is described on the attached Kansas Lifeline Service Program Self Certification Form, and is verified at least once each year:

The Company's Terms and Conditions for Lifeline Service also are found in the applicable pages of its General Exchange Tariff, which are also attached.

# KANSAS LIFELINE PROGRAM

*Save up to  
**\$17.02 off** your  
telephone bill!*

You may be eligible to receive up to **\$17.02 off** your monthly local telephone bill through the *Lifeline Program*.

## ***You are eligible if you receive any of the following:***

Supplemental Nutrition Assistance Program, General Assistance, Bureau of Indian Affairs General Assistance, Temporary Assistance for Needy Families, Tribally Administered Temporary Assistance for Needy Families, Medicaid, Supplemental Security Income (SSI), Head Start (tribal programs for only those meeting its income qualifying standard), Free School Lunch Program, Tribally Administered Free School Lunch Program, Food Distribution Program, Low Income Energy Assistance Program (LIEAP), Section 8 Public Housing Assistance, Food Distribution Program on Tribal Lands, or 150% of the federal poverty level\*. A consumer must provide **THREE CONSECUTIVE MONTHS** of statements as documentation of income, or provide a copy of his or her tax return for the previous year.

For more information about *Kansas Lifeline*, call your **local** telephone company. The number is on your telephone bill or in the front part of the telephone directory.

## **\*2015 Kansas Poverty Level Guidelines**

Number In Household	Maximum Annual Income
1	\$17,655
2	\$23,895
3	\$30,135
4	\$36,375
5	\$42,615
6	\$48,855
7	\$55,095
8	\$61,335
Each additional person in household	\$ 6,240

*The Kansas Lifeline program is 150% of the 2015 federal poverty level.*



<http://www.kcc.state.ks.us/pi/lifeline.htm>

**REDACTED – FOR PUBLIC INSPECTION**

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**COLUMBUS COMMUNICATIONS SERVICES, LLC (SAC 411756)**

**ATTACHMENT - LINE 3026, and  
FINANCIAL DATA SUMMARY – LINES 3027-3034**

**REDACTED IN ENTIRETY**